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Development Services Department

Advance Planning Division

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A-7-1

The City of Chula Vista has reviewed the various documents associated with the proposed Village 13 Resort Village (Project). Village 13 is a part of the Otay Ranch project that was jointly entitled by the City of Chula Vista and the County of San Diego. The Otay Ranch includes a Biological Preserve that is jointly managed by Chula Vista and the County. The proposed project consists of a the General Plan (GPA) amendments, Sub Regional Plan amendment (SRPA), adoption of a Specific Planning Area Plan (SPA), approval of a Tentative Map (TM) and approval of the proposed Resource Management Plan amendments (RMPA) for the Village 13 Resort Village. The Project includes the proposed development of 1,881 single-family dwelling units, a mixed-use area with 57 multi-family residences and up to 20,000 square feet of neighborhood commercial uses, and a 17.4-acre resort hotel that would consist of up to 200 guest rooms and up to 20,000 square feet of ancillary commercial/office uses, including meeting rooms, a conference center, offices, shops, and restaurants. The Project also includes an elementary school site, nine park sites, a public safety site that could house a fire station and law enforcement storefront, approximately 1,089 acres of Preserve open space, and approximately 144 acres of other open space.

The following are the City of Chula Vista's comprehensive comments on the above referenced documents, excluding the DEIR. Our comments on the draft EIR were provided to the County on May 22, 2015 during the public review period. This comment letter does not supersede our DEIR comment letter.

Tentative Map comments provided by Tom Adler at 619-409-5483/Harold Phelps 619-409-5872

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| A-7-2 | <ul style="list-style-type: none">• There are existing access roads to adjacent parcels that effectively become land locked once the project is approved – see access to “Not a Part” parcels to the north from gate guarded Piazza Cascina TM 13B, sheet 9 and other similar situations |
| A-7-3 | <ul style="list-style-type: none">• There are existing City of Chula Vista access easements that are not compatible with residential uses (Doc # 2001-0272344 and 2001-0272345) |
| A-7-4 | <ul style="list-style-type: none">• Otay Lakes Road is a scenic highway but the project provided no criteria to ensure the road construction was consistent with the City’s general plan guidance on scenic highways. |
| A-7-5 | <ul style="list-style-type: none">• There are off-site easements needed for brush management, see TM13B, sheet 9 |
| A-7-6 | <ul style="list-style-type: none">• Per the Otay Ranch GDP/Otay SRP Mobility policies, multiple points of access in a grid system shall be provided, and block perimeters shall not exceed 2,000-feet. In addition cul-de-sacs should only be permitted in perimeter locations or with pedestrian links. Many of the streets shown on the tentative maps exceed 2,000-feet in length and require the provision of collector streets or paseo connections. |
| A-7-7 | <ul style="list-style-type: none">• Trail connections to open space and OVRP must be shown on the map. Access controls (i.e. fencing) should be noted on the map, as well. |
| A-7-8 | <ul style="list-style-type: none">• The EIR correctly states that <i>“The County cannot the County cannot assure that the City will permit implementation of the improvements”</i> therefor the proposed sewer line serving the project located within Otay Lakes Road, within the City of Chula Vista, as shown on sheet 6 of the Village 13A Tentative Map cannot be assumed to be constructed, and, by extension, sewer impacts of the project are significant and unmitigated. |
| A-7-9 | <ul style="list-style-type: none">• The EIR states that dual sewer force mains will provide redundancy however the Tentative Maps fails to identify dual force mains (TM Village 13 A, Sheet 6) |

Water Quality comments provided by Silvester Evetovich (619)397-6121

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| A-7-10 | <ul style="list-style-type: none">• Water quality basins are too close to the Lower Otay Reservoir, contrary to Otay Ranch GDP/Otay SRP policies for Capital Facilities, Public Facilities (Section C), Urban Runoff Facilities. Developments in the Proctor Valley and San Ysidro Parcels drain into the Otay Reservoirs, and the goals, objectives and policies of the Otay Ranch GDP/Otay SRP require that the SPA identify potential drainage impacts on the reservoir system and that a Reservoir Protection Plan be provided to the City of San Diego, which may result in the creation of off-site drainage facility buffered by distance from the reservoirs. |
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Hazards and Hazardous Materials comments provided by Tom Adler at 619-409-5483

- A-7-11 | • The Navy Leap Frogs routinely use the field as a base of operations, we suggest that the military and FAA be notified of the proposed project pursuant to page 10 of the County Airport Guidance and the FAA issued a final rule for CFR Part 77 for the "Safe, Efficient Use and Preservation of the Navigable Airspace"
- A-7-12 | • The airstrip is erroneously called out as a temporary airstrip in technical reports and documents. This needs to be corrected since the facility is not temporary.

Parks comments provided by Mary Radley at (619)407-3542

- A-7-13 | • The SPA plan, page 72, lists the demand for park acreage as 16.63 acres while the other documents identify the requirement as 20.9 acres. Village 13 is required to meet its park provision within its own boundaries. Check all documents for consistency on park acreage and ensure that the park provision meets the County standards in full on site so that there is no impact to Chula Vista's parks system as a result of a shortfall in park provision in Village 13.
- A-7-14 | • Various project reports refer to three parks located in the City of Chula Vista. These parks were constructed to serve residents of the City of Chula Vista and to maintain the City's standard of 3 acres/1,000 residents. These parks were not sized to serve the Project's residents. City funding is not available to fund maintenance resulting from additional wear and tear on facilities caused by Project's residents.

Specific Plan – Appendix IV Public Facilities Finance Plan (PFFP)

- A-7-15 | • The Public Facilities Development Impact Fee Program does not assume facilities to serve this Project and therefore the funding for the projects and maintenance have not been identified.
- A-7-15 | • Funding for County facilities is addressed in the PFFP, however there is no funding source provided for the Chula Vista facilities which is clearly assumed to serve the Project.
- A-7-15 | • With no Project revenues allocated to the City of Chula Vista, how will these financial impacts be addressed?
- A-7-16 | • It is assumed that the City of Chula Vista animal control facilities will provide services to the Project, but no funding mechanism is provided to support these services.

- A-7-17
- The Report concludes that sufficient tax revenues will be generated to support the Project. All tax revenues discussed accrue to the County of San Diego, even though the City is assumed to provide many services including animal control services.

Libraries

- A-7-18
- The planned library in the Civic Core of the Millenia (formerly EUC) project is not sized to serve the Project's residents. Accommodating these impacts would require a larger library facility. This would require funding to offset the additional construction and related costs associated with the additional square footage. Further, ongoing tax support would be required to offset the incremental additional operational and maintenance costs.

- A-7-19
- There are no public libraries planned for the University site in Otay Ranch.

Fire and Emergency Services

- A-7-20
- The FPP/PFFP refers to Chula Vista Fire Station Nos. 8, 7, and 2. Is the ability to provide adequate fire protection to the project site based on the assumption that calls for service in this area will rely on these Fire Stations?

- A-7-21
- The proposed onsite fire facilities and staffing includes a single engine company. A single company is insufficient for round the clock coverage. Who would provide fire and emergency response services outside the time staffed by the single company? Would Chula Vista units be expected to respond? Or would the Jamul station respond, with the reported 12-14 minute travel time? It would appear that this would be an unacceptable response time for safety purposes. A single company is also insufficient if more than a single emergency must be responded to at once. Again, would Chula Vista units be expected to respond? Or would people be forced to wait for a response from the Jamul station?

- A-7-22
- A single company is insufficient to provide an Effective Fire Force (EFF), which would include three engines, one truck, and one battalion chief. Which stations will provide the additional resources required to assemble the EFF? How long will it take to assemble an EFF? Is response by Chula Vista stations assumed?

- A-7-23
- Temporary fire staffing is to consist of 2 full-time firefighters and 1 volunteer. A 3 person crew is insufficient to establish an Initial Attack Force, which requires 4 persons, per OSHA. What station will provide the fourth person?

- A-7-24
- How will medical transport is provided. Will the fire engine be delivering patients to the hospital?

Wastewater/Sewer comments provided by Luis Pelayo (619)476-5387

- A-7-25 | • Sewerage service is proposed to be provided by entering into a flow transfer agreement with the City of Chula Vista for service via the Salt Creek Interceptor. Assumption of a future agreement to be negotiated is not a sufficient means of providing sewer services to the Project.
- A-7-26 | • The sewage generation factors used for the project shall be analyzed utilizing the 2014 City of Chula Vista Wastewater Master Plan duty factors (contact the City for the design standards).
- A-7-27 | • The population peak factors shall be analyzed utilizing the City's design standards .
- A-7-28 | • Revise all reports and documents for Village 13 to reflect that the 2015 Salt Creek DIF Update does not include the areas in the County known as Village 13, 14 and 16. Although these properties were included in the 2004 DIF and the November 1994 Basin Study, it is assumed that once the County development has been defined and authorized, and subsequent to the necessary technical sewer studies by the County, the DIF will be updated.
- A-7-29 | • Impact Fees shall be analyzed utilizing the 2014 City's Wastewater Master Plan duty factors.
- A-7-30 | • If the City of Chula Vista allows the project to connect to the City wastewater system, the applicant will be required to pay sewer connection and impact fees at the time of building issuance".
- A-7-31 | • The sewer system including lift stations shall be designed per Chula Vista's standards (see City design standards).
- A-7-32 | • An updated cumulative impact sewer study will be needed to demonstrate that the Salt Creek Interceptor has been sized to accommodate ultimate development in the service area, including the project. The updated study needs to use updated land use projections and sewage generation factors. The November 1994 Salt Creek Basin Study is based on outdated sewage generation duty factors and land use/flow projections.
- A-7-33 | • A new study will be needed to determine a fee funding program for future improvements to the Salt Creek Interceptor. The November 1994 study is based on outdated sewage generation duty factors and land use/flow projections.
- A-7-34 | • Sewage from the Project will flow through the Salt Creek Interceptor, to be treated at the Point Loma Wastewater Treatment Plant. The PFFP states that the County of San Diego has sufficient treatment capacity with the San Diego Metro System for the additional Project flows. If all flows associated with the Project will be conveyed via the City of Chula Vista's Salt Creek Interceptor, how will those flows be distinguished from City of Chula Vista

A-7-34
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flows? Without a permanent means of clearly distinguishing Project flows from other Salt Creek Interceptor flows, the City of Chula Vista is at risk of being charged not only for additional capacity acquisition, but the treatment of Project flows without an appropriate funding mechanism.

Transportation and Traffic – comments provided by Dave Kaplan (619)691-5025

A-7-35

- Page 53 of GPA Report states that Otay Lakes Road is a 4 Lane Boulevard with Raised Median from Hunte Parkway to Strada Piazza. It is recommended that if the road is going to be redesigned that the new graphics be split by jurisdiction and labeled correctly in the City of Chula Vista.

A-7-36

- City projects contribute to the Transportation Development Impact Fees and Traffic Signal Fees to fund improvements that address cumulative impacts related to the project. Since this project is not part of the City, how will cumulative impacts be mitigated? Project trips will generate additional wear and tear on City transportation facilities which will require additional maintenance effort by the City. How will this additional maintenance effort be funded? The project also proposes to widen certain transportation facilities within the City. How will maintenance of the widened facilities be funded? Typically, the City would fund these efforts through a combination of Highway Users' Tax (Gas Tax) and discretionary tax revenues (Property and Sales Taxes.). With no Property Tax, Sales Tax, or Gas Tax revenues generated within the Project allocated to the City, the City has no means of funding these expenses.

Trails comments provided by Lynnette Tessitore-Lopez (619)409-5465

A-7-37

- Please provide the Master Plan document that is referred to in Section 12.5.3 of the DEIR. The Master Plan document was not included as part of the public review documents provided for the Otay Ranch Village 13 Master Planned Community Resort Village

Village Design Plan

A-7-38

- Trail Linkages, Page 48. The Master Plan must include a discussion of trail linkages to the OVRP. In addition, all proposed trail linkages must be analyzed in the DEIR including potential off-site impacts.

A-7-39

- Exhibit O, Page 111. This exhibit must include all proposed trails and trail connections to the OVRP.

Preserve Edge Plan

A-7-40

- The Preserve Edge Plan must include a discussion of trail connections and how the trails proposed as part of this project will interface with the Preserve, OVRP, and City of San Diego Cornerstone lands with the OVRP.

Comments on Proposed updates to RMP II provided by Glen Laube (619)476-2329

A-7-41

The City, as a joint agency under an existing Joint Powers Agreement (JPA), appreciates the opportunity to review the proposed updates the Phase II RMP. While many of the updates proposed reflect 'clean-up' items contemplated in 2009 when joint update efforts were last underway, it is now apparent that that more substantial updates may be needed to address current and future processes regarding administration, funding, conveyance tracking and management. The City believes to would be presumptuous to provide specific edits without consulting with the County and the Otay Ranch Preserve Steward Biologist. Therefore, the following comments are not intended for strike-out-underline edits but rather to provide examples of areas where the RMP II, as a whole, is stale and in need of comprehensive updates:

A-7-42

- General Comment: The Notice of Preparation (NOP) indicates that the project requires an amendment to the RMP. As stated in the currently RMP, the County adopted Board of Supervisors Policy I-109 to provide direction to County decision-makers concerning the processing of amendments to the RMP. The Policy provided that the following procedure shall be followed when processing an amendment to the RMP: "The Department of Planning and Land Use shall be responsible for preparation and processing of such an amendment. The amendment shall be prepared in consultation with the City. The Department shall prepare a report which analyzes the impacts of the proposed amendment and the comments received from the City of Chula Vista." To date, a report analyzing how the County's proposed amendments may affect the City's coverage and/or assembly, management and monitoring of the Otay Ranch Preserve has not been prepared or submitted.

A-7-43

- General Comment: As it relates to the adequacy of the EIR and the fact that the County did not fully adopt Phase II RMP in 1998 as mitigation for its portion of Otay Ranch, it would behoove the County to thoroughly examine the RMP to ensure that the document will provide adequate mitigation for the take of sensitive biological and cultural resources.

A-7-44

- General Comment: The GDP and RMP were developed approximately twenty years ago under the premises that there would be one property owner conveying land to a single management entity (ideally a third-party manager). Accordingly, the goals, objects and policies developed for the GDP/RMP were developed around this unified concept. While this was appropriate for the time and [then] existing conditions, there are now multiple property owners/developers, multiple land managers, updated management strategies and monitoring protocols, and a POM entity comprised of two local municipalities operating as a single entity under a JPA. POM staff need time to go through the policies and update as necessary to address these existing conditions under the context of practicality, efficiency, and implementation. Of concern is that the antiquated nature of the document

and lack of detail could result in an inefficient use of administrative/steward resources and delayed conveyances.

A-7-45

- Page 5, Table 2, General Comment: The document identifies several tasks “which must be completed as a condition of subsequent approvals.” These tasks include, but are not limited to, the Long-term Raptor Management Program, Otay Valley Riparian Habitat Restoration Plan, Demonstration Agriculture Plan, and OVRP Active Use Plan. Updates to the RMP should clearly indicate which SPA Plan(s) are responsible for fulfilling these requirements and identify the trigger for implementation (e.g., SPA Plan/TM approval, Final Map, grading Plan, etc.).

A-7-46

- Page 15, POM Management Structure (bulleted list): The following should be discussed among POM joint staff:
 - RMP should state that the POM structure should be revised every five years “or as directed by the Policy Committee.”
 - RMP should state that specific roles and responsibilities may change from time to time.
 - References to the Chula Vista City Manager should also state “or its designee.”
 - References to the “interim” POM need to be explained.
 - Consideration should be given to review and possibly amend the JPA to authorize the city and County to manage the lands conveyed in conjunction with mitigation requirements for developments approved within each respective jurisdiction.

A-7-47

- Page 15: POM Responsibilities (example of why further updates are needed): Additional updates are needed to provide clarification regarding POM structure and to make the document more user friendly to our respective constituents. As an example, page 15 RMP establishes the POM as an advisor to the City and County of when actions are proposed that can affect the Otay Ranch Preserve, such as Village 13. Statements like this are confusing to the reader as it infers that the “POM” is a third-party providing recommendations on actions affecting the preserve as a whole when in fact it’s actually the City and County advising itself on its own initiatives. This creates a situation where the City and/or County can promote updates independently, which is not conducive to the spirit and intent of the JPA and should be reconciled through updates to the RMP.

A-7-48

- Page 16, Table 3: Refer to general comments above regarding the need to update RMP goals, policies, and standards to reflect the POM’s current administrative structure.
- Page 16, Table 3: It is not clear why some phrases are emphasized in bold text. This should be corrected in the revised document.
- Page 17, Policy 5.2: References to the OVRP should be supplemented with a graphic delineating the boundary of OVRP relative to the boundary of the Otay Ranch Preserve.

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| A-7-49 | <ul style="list-style-type: none">• Page 19, Otay Ranch Preserve Conveyance: This section of the RMP should provide a more descriptive preamble explaining how the approved conveyance calculations and corresponding methodology were based using the programmatic land use assumptions of the 1993 GDP/SRP. In this regard, it should be explained that acreages referenced in the RMP should be viewed as forecasts as actual conveyances are determined at final map using more precise planning and engineering data. |
| A-7-50 | <ul style="list-style-type: none">• Page 20, Updated Forecast: The documents states since the enactment of Phase I and Phase II, Otay Ranch SPA Plans have been approved. This is not accurate as not all Villages have approved SPA Plans. As a result, RMP conveyance forecasts are still based in part on GDP land use assumptions. This should be clarified in the updated RMP. |
| A-7-51 | <ul style="list-style-type: none">• Page 20, Updated Forecast, last paragraph: This sentence appears to be incomplete and should be revised to provide clarity. Further, the inference that differences between the original and current RMP conveyance forecasts are the result of changes to Village boundaries in the Otay Valley Parcel is incorrect. As discussed with the County, the numerous changes in Village boundaries rendered the original RMP Exhibit 9 obsolete and inefficient. Changes in the Village boundaries do not contribute to differences in the ranch-wide conveyance forecasts. Factors contributing to the differences in conveyance forecasts are described below. Lastly, a comparison between current RMP Exhibit 9 and proposed Table 4 indicates that there are also differences in the Proctor Valley Parcel. This should be clarified in the updated RMP. |
| A-7-52 | <ul style="list-style-type: none">• Page 20, Updated Forecast/Table 4: The build-out preserve contribution of 10, 506 acres should be footnoted to indicate that this is a forecast and subject to change as more precise planning and engineering becomes available during the review of project specific final maps. |
| A-7-53 | <ul style="list-style-type: none">• Pages 20-21, Updated Forecast: The proposed updates do not adequately describe why/how the original ranch-wide 1996 RMP conveyance forecasts have/will differ from actual conveyances obligations. As previously discussed with the County staff, differences, including forecasts associated with Village 13/Proctor Valley, are largely associated with the following contributing factors:<ul style="list-style-type: none">• Mapping/Acreage Refinements<ul style="list-style-type: none">○ RMP conveyance forecasts are based on 1993 GDP level development areas (coarse data based on generally defined development areas)○ Actual conveyances are based on final map calculations (more precise planning and engineering data).• Common Use Areas<ul style="list-style-type: none">○ Acreages of parks and schools are greater than original RMP forecasts.○ Size and alignment of arterials differ from original RMP forecasts.• Assumptions for “Development Areas” Subject to Conveyance<ul style="list-style-type: none">○ Inclusion of Open Space Preserve as areas subject to conveyance○ Agency acquisitions of development/preserve areas. |

- A-7-54 | A more transparent discussion on conveyance obligations, adopted methodology, and assurances for preserve build-out should be provided in the updated RMP.
- A-7-55 |
 - Page 21, Updated Forecast: The sentence: "...any acreage anticipated to be conveyed to the POM could be off-set through...the Non-Otay Ranch Mitigation Program..." is confusing and needs further explanation. It is unclear why lands that are currently anticipated (i.e., available Preserve lands to be conveyed through the final map process) would need to be "off-set." If the intent is to acknowledge that the implementation of the adopted conveyance methodology/mechanism will not assemble the forecasted 11,375 acres but that there are other mechanisms in place that could do so, then it should be more clearly stated. In addition, the section should address how build-out of the 11,375 acre Preserve through the mitigation of "non-Otay Ranch projects" would not be considered double-dipping.
- A-7-56 |
 - Page 21, Conveyance Timing: Please remove the statement indicating that an IOD may be accepted under circumstances whereby land is conveyed in excess of the conveyance requirement and that there is no existing funding.
- A-7-57 |
 - Page 22, Conveyance Timing: The RMP should indicate that based on the results of the Phase I ESA, a Phase II ESA report and additional site testing may be required prior to POM approval.
- A-7-58 |
 - Page 23, Permitted Uses, Non-Otay Ranch Project Mitigation Lands Program:
 - The RMP should include a more detailed on this program so joint staff, wildlife agency regulators and the public do not have to refer to multiple documents.
 - The approved program does not specify an acreage threshold for how much "mitigation" land is available for Non-Otay Ranch Projects. The updated RMP should establish a maximum acreage that can be used to ensure that the program will not preclude future development projects within Otay Ranch from fulfilling their respective conveyance obligations.
- A-7-59 |
 - Page 23, Policy 5.12: This policy needs to be updated to reflect: 1) that the City has an adopted funding mechanism for long-term preserve management; and, 2) to establish the timing and criteria for the County's forthcoming funding mechanism.
- A-7-60 |
 - Page 27, Regional Opportunities: The purpose and need for this section is unclear. Please revise to clarify.
- A-7-61 |
 - Page 28, San Diego National Wildlife Refuge, last paragraph: For consistency, the phrase "are included" should be replaced with something similar to what is stated the first paragraph: "...purchased or placed under an agreement..."
- A-7-62 |
 - Figure 29: Third-party acquisitions should be removed from the map as there are no provisions to maintain this map as additional lands are acquired. Updates that will be quickly become stale should not be advanced in updates to the RMP.

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| A-7-63 | <ul style="list-style-type: none">• Page 31, Estimated Otay Ranch Monitoring and Management Costs: While a funding mechanism has been created for lands conveyed in conjunction with development in the preserve, the updates do not describe how and when the County will establish its funding mechanism. Furthermore, to avoid unnecessary delays in management, the updated RMP will need to address how the POMs intra- budgetary and funding processes will be managed across two jurisdictions. |
| A-7-64 | <ul style="list-style-type: none">• Page 32, Estimated Otay Ranch Monitoring and Management Costs: Statements indicating that the County will establish a “like funding mechanism” are too vague. The POM, through the RMP updates, should establish the criteria for the County’s funding mechanism to ensure adequate funding will be available when needed. |
| A-7-65 | <ul style="list-style-type: none">• Page 32, Otay Ranch Preserve Budget: Including a summary and breakdown of the FY2014/15 fiscal year budget and associated tasks serves no purpose and will be quickly become outdated. The discussion regarding funding should be revised to describe the process by which the POM establishes the annual operating budget. Similarly, listing the activities performed during FY2014/15 is irrelevant as tasks vary each year based on the priorities and recommendation presented in the annual work plan. |
| A-7-66 | <ul style="list-style-type: none">• Page 34 (Phase II RMP Studies): The document incorrectly states that the RMP requirement to prepare a long-term raptor management plan was satisfied by the Otay Raptor Management Study (Ogden 1992) which was prepared in conjunction with the Otay Ranch GDP/SRP PEIR. Please note that the 1992 Ogden study was prepared to assess the potential impacts of the GDP/SRP development on raptors and provide recommendations for the preparation of a subsequent long-term management program to be prepared by the property proponent (GDP/SRP Mitigation Measure 35). Updates to the RMP should clarify that a long-term raptor management plan is still required by the project proponent to fulfill the mitigation obligations of the GDP/SRP. |
| A-7-67 | <ul style="list-style-type: none">• Page 34 (Ranch-Wide Phase II Studies), General Comment: The ability to manage the preserve as contemplated in the RMP may no longer be practical and/or feasible given, among other things: existing/future geographic separation of POM lands, [then] approved survey methodologies, multitude of current/ and probable future land owners and land managers, changes in survey techniques/regional priorities for Covered Species, etc. POM staff in collaboration with the Preserve Steward Biologist should review and update, as necessary, the management strategies presented in the RMP to ensure the continued protection of biological resources. |
| A-7-68 | <ul style="list-style-type: none">• Page 38 (Cultural Resources Survey): As a ranch-wide management document, it is confusing that the RMP contains conflicting policy language for the same geographical area. This should be reconciled in the updated RMP. Based on the City’s policy language, it is expected that cultural resources surveys for the entire Proctor Valley Parcel will be completed in conjunction with the first SPA Plan processed in the Proctor Valley Parcel (i.e., Village 13 SPA Plan). |

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| A-7-69 | <ul style="list-style-type: none"> Page 39, Vernal Pool Preservation and Management Plan: The RMP should be updated to address how implementation of this plan is affected by limitations for ground disturbances within FUDS designated areas, Caltrans mitigation acquisitions, and County of San Diego acquisitions. |
| A-7-70 | <ul style="list-style-type: none"> Page 43, Figure 7: The updated RMP should include revisions to Figure 7 and any corresponding text to reflect/address Caltrans mitigation acquisitions. |
| A-7-71 | <ul style="list-style-type: none"> Page 46, Vernal Pool Mitigation: It is unclear why GDP/SRP mitigation is repeated in the RMP. The required GDP/SRP mitigation measures restated in this section of the RMP are the responsibility of the project proponent, not the POM. The updated RMP should focus on the long-term management of these areas if/when they are conveyed to the POM. |
| A-7-72 | <ul style="list-style-type: none"> Page 47, Vernal Pool Mitigation Bank Opportunities: The updated RMP should state the provisions by which the POM would provide long-term management of mitigation lands associated with impacts for non-Otay Ranch development projects. |
| A-7-73 | <ul style="list-style-type: none"> Page 49, Management Recommendations: The updated RMP needs to be clear that measures (e.g., fencing, signage, education, monitoring during construction, etc.), to reduce indirect impacts associated with Otay Ranch development are the responsibility of the project proponent, not the POM. |
| A-7-74 | <ul style="list-style-type: none"> Page 54, Table 9: It is not clear if the acreages for each Village are based on the original GDP/SRP Village boundaries or current SPA Plan boundaries. The updated RMP should also confirm the date and source of the information presented in this table. |
| A-7-75 | <ul style="list-style-type: none"> Page 54, Biota Monitoring Program: As previously indicated, the biota monitoring program should be reviewed and updated, as necessary, to ensure management and monitoring practices are comparable with current industry standards and regional priorities. In addition, the updated RMP should acknowledge and establish the framework by which monitoring standards are periodically reviewed and updated by the POM. |
| A-7-76 | <ul style="list-style-type: none"> Page 55, Phase I RMP bullets: The updated RMP should describe how the POMs annual work plans fulfill the Phase I RMP guidelines for Phase II RMP. |
| A-7-77 | <ul style="list-style-type: none"> Page 58, Species listed as Category 1 or 2 Candidate Species should be reviewed and updated as necessary by the Preserve Steward Biologist to ensure consistency with current listings. |
| A-7-78 | <ul style="list-style-type: none"> Page 60 Table 11: POM staff should discuss the relevance of this table. If this Table should remain, the RMP should be clear that monitoring of the habitats listed in Table 11 begins once land has been conveyed to the POM. Monitoring schedules for POM managed lands are provided in the annual work plan which is updated annually to account for newly conveyed land. |
| A-7-79 | <ul style="list-style-type: none"> Page 64, Steep Slopes: The last sentence on Page 64 indicating that only 1,387 acres of steep will be impacted should be removed. This acres forecast is based largely on |

A-7-79 Cont	<p>program level information and subject to change as future maps are processes. The updated RMP should focus on the maintaining the 83% ranch-wide standard.</p>
A-7-80	<ul style="list-style-type: none"> • Page 66, Table 12: The acreages for existing steep slopes in Proctor Valley and San Ysidro are missing. This needs to be corrected in the updated RMP. • Page 66, Table 12: There is no correlation between the numerated footnotes and the actual text contained in Table 12. This should be corrected in the updated RMP.
A-7-81	<ul style="list-style-type: none"> • Page 66, Table 12: SPA Plans for Village 4, University and Innovation District and Planning Area 18 have not been approved. As such, acreages associated with these areas should be included under "Remaining SPA Plans."
A-7-82	<ul style="list-style-type: none"> • Page 68, Section 5: The City does not concur with the proposal to remove the "Conceptual MSCP Siting Criteria" until such time as the County updates its Subarea Plan to include specific facilities siting criteria. While Section 1.9 of the County's MSCP Subarea Plan acknowledges that certain facilities are allowed within the preserve it does not provide specific avoidance/minimization criteria to ensure that such facilities have been planned and designed to minimize and/or avoid significant impacts to MSCP Covered Species and habitats. <p>Absent any specific County adopted siting criteria, the County should, at a minimum, adhere to the MSCP Siting Criteria provided in current RMP Policy 6.6(a). This direction is also consistent with the discussions held in July 2008 at both the POM Preserve Management Team and Policy Committee meetings where it was agreed that projects proposing facilities within the Otay Ranch Preserve shall utilize the City's Facilities Siting Criteria (Section 6.3.3.4 of the Chula Vista MSCP Subarea Plan) and implement Policy 6.6 of the RMP. As it relates to the adequacy of the EIR, the EIR has not demonstrated that Village 13 facilities proposed within the Otay Ranch preserve have been sited in the least environmentally sensitive areas in accordance with current RMP policies.</p>
A-7-83	<ul style="list-style-type: none"> • RMP II Update, Section 5 and Figures 13-18: Maps and corresponding text depicting infrastructure in the preserve should be updated to include existing facilities (completed), MSCP Planned Facilities (not completed), and facilities associated with approved SPA Plans and Tentative Maps. Based on our review, the updated Figures do not reflect roads and infrastructure associated with, but not limited to, Village 4/Wolf Canyon, the recently approved JPB University Villages Project, OLC Villages 8 East and 9 and Chula Vista University and Innovation District.

A-7-83

Please feel free to contact me at (619)585-5707 or any of the staff members identified in this letter if you have any questions regarding this matter. Please include me on the mailing/circulation list for all information concerning the proposed project and notify me of any and all public meetings on the proposed project. I request to be notified of all public meetings related to the Project at mponseggi@chulavistaca.gov.

Sincerely



Marilyn R. F. Pongeggi
Principal Planner

Cc: Gary Halbert, City Manager
Kelly Broughton, Development Services Director
Ed Batchelder, Planning Manager
Glen Laube, Senior
Tom Adler, Principal Civil Engineer
Glen Googins, City Attorney
Michael Shirey, Deputy City Attorney